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January 19, 2023

VIA ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Barbara Delo v. Paul Taylor Dance Foundation, Inc. d/b/a Paul Taylor Dance Company,
et al.
Case No.: 22-cv-09416-RA

Dear Judge Abrams:

We represent Defendants Paul Taylor Dance Foundation, Inc. d/b/a Paul Taylor Dance Company and John Tomlinson. We write on behalf of the Parties to request that the January 27, 2023 initial court conference be adjourned *sine die*, or, if the motion is denied, to a date two weeks following the Order denying the motion, in light of Defendants' pending Motion To Compel Arbitration (Dkt. 11).

The Parties have reached an agreement to exchange limited discovery pursuant to the Pilot Discovery Protocols for Counseled Employment Cases identified in the Southern District of New York's Second Amended Standing Administrative Order (M10-468),¹ with a date set for an exchange of these initial documents of February 10, 2023. Accordingly, the Parties further request that the Court stay remaining discovery pending a decision on the motion.

The Parties further propose the following briefing schedule on Defendants' Motion to Compel Arbitration:

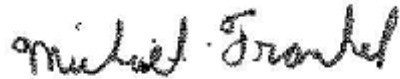
- Plaintiff's Opposition due: February 9, 2023
- Defendants' Reply due: February 23, 2023.

Thank you for your consideration.

¹ <https://www.nysd.uscourts.gov/sites/default/files/pdf/2015-SecondAmendedStandingAdminOrder-Counseled-Employment.pdf>

Respectfully submitted,

JACKSON LEWIS P.C.



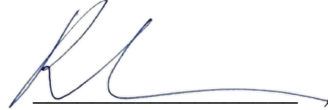
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cc: Counsel of record (via ECF)

4894-3608-7370, v. 3

Application granted. The initial conference scheduled for January 27 is hereby adjourned, and the Court adopts the briefing schedule proposed by the parties. Any discovery beyond the limited discovery agreed upon by the parties is stayed pending the Court's decision on the motion to compel arbitration.

SO ORDERED.



Hon. Ronnie Abrams
January 20, 2023